

Local Form 4A

June 2015

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

IN THE MATTER OF:

Mohammad Hosseini

Debtor(s)

Case Number: 17-31053

AMENDMENT TO:

CHAPTER 13 PLAN, INCLUDING NOTICE OF MOTION(S) FOR VALUATION;  
MOTION(S) TO AVOID CERTAIN LIENS; MOTION(S) FOR ASSUMPTION AND  
REJECTION OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND NOTICE OF  
OPPORTUNITY FOR HEARING ON CONFIRMATION OF THE PLAN INCLUDING ALL MATTERS AS  
SET FORTH IN THE PLAN,  
FOR CASES FILED ON OR AFTER JUNE 1, 2015

Check for motions applicable to this plan amendment:

- ( ) Motion to Value Liens Includes Valuation of Property Securing A Claim  
( x ) Motion to Value Liens Includes Valuation of Property Securing A Claim In an Amount Less  
than the Amount of the Claim  
( ) Motion to Avoid Liens § 522(f)  
( ) Motion to Assume Executory Contract(s) and Unexpired Leases  
( ) Motion to Reject Executory Contract(s) and Unexpired Leases  
( ) No motions applicable to this plan amendment

The Chapter 13 Plan, including certain motions and other provisions, is hereby amended as follows:

1. a. The plan proposes to pay \$2300.00 per month for 60 months (est. payout to unsecureds \_\_%) OR  
for 1% payout to unsecureds.

CLASSIFICATION AND TREATMENT OF CLAIMS

2. Secured Claims

- a. Treatment of Secured Claims [using treatment terms shown in ¶ 4a of the Plan attached]:

Creditor	Collateral	Value of Coll.	Claim Amt.	Treatment	Int. Rate (numeric)
BB&T	2215 West Blvd. Charlotte, NC 28206	\$80,000.00	\$198186.50	As valued	6%

TAKE NOTICE: Your rights may be affected. You should read this amendment to the Chapter 13 Plan carefully, including any motions contained in the amended plan, and discuss them with your attorney, if you have one, in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to confirm the proposed plan of the debtor or debtors ("Debtor") as amended, including any of the motions included in the amended plan, or if you want the Court to consider your views on these matters, then you or your attorney must file with the Court a written objection to confirmation and request for hearing on confirmation at the following addresses:

**Cases filed in the Charlotte, Shelby, or Wilkesboro Divisions:**

Clerk, U.S. Bankruptcy Court, 401 West Trade St., Room 111, Charlotte, N.C. 28202

**Cases filed in the Asheville or Bryson City Divisions:**

Clerk, U.S. Bankruptcy Court, Room 112, 100 Otis Street, Asheville, N.C. 28801

Your objection to confirmation and request for hearing must include the specific reasons for your objection and must be filed with the Court no later than 14 days following the conclusion of the § 341 meeting of creditors, or within 14 days of service of the amendment, whichever is later. If you mail your objection to confirmation to the Court for filing, you must mail it early enough so that the Court will receive it on or before the deadline stated above. You must also serve a copy of your objection to confirmation on the Debtor at the address listed in the notice of the meeting of creditors. The Debtor's attorney and the Chapter 13 Trustee will be served electronically. If any objections to confirmation are filed with the Court, the objecting party will provide written notice of the date, time, and location of the hearing. No hearing will be held unless an objection to confirmation is filed.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the proposed plan of the Debtor as amended, including any motions contained in the amended plan, and may enter an order confirming the amended plan and granting the motions. **Any creditor's failure to object to confirmation of the proposed plan as amended shall constitute the creditor's acceptance of the treatment of its claim as proposed, pursuant to 11 U.S.C. § 1325(a)(5)(A).**

I declare under penalty of perjury that the information provided in the Amendment to Chapter 13 Plan, including Notice of Motion(s) for Valuation; Motion(s) to Avoid Certain Liens; and Motion(s) for Assumption and Rejection of Executory Contracts and Unexpired Leases; are true and correct as to all matters set forth herein.

Dated 8/17/2017


  
Debtor's Signature

Dated \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

I hereby certify that I have reviewed this document with the Debtor and that the Debtor has received a copy of this document.

Dated 8/17/17

  
Attorney for the Debtor

[Attach Certificate of Service if Served on Creditor(s)]

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**IN RE: Mohammad Hosseini**

**Chapter: 13**

**Debtor(s).**

**CASE NO.: 17-31053**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing **Amended Chapter 13 plan (FORM 4a)** has been forwarded to the following by US Mail, and/or Electronic Case Filing:

Chapter 13 Trustee  
Warren L. Tadlock, Esq.  
5970 Fairview Road  
Ste. 650  
Charlotte, NC 28210  
(ECF)

Bankruptcy Administrator (ECF)

All creditors (see attached matrix)

**DATED: August 3, 2017**

**BY: /s/ FREDERICK W. HOETHKE, ESQ. 48423**  
**FREDERICK W. HOETHKE, ESQ. 48423**  
**#**  
**SAFFA LAW GROUP, PLLC**  
**Attorney for Debtor**  
**Providence Park**  
**10710 Sikes Place, Suite 180**  
**Charlotte, NC 28277**  
**(704) 246-8203**  
**rick@saffalawgroup.com**

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Charlotte, NC 28226

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PO Box 1847  
Wilson, NC 27894

Mecklenburg County Sheriff's Office  
700 E. 4th Street  
attn: Corporal K.F. Williams  
704 432-1676 (fax)  
Charlotte, NC 28202

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832 E. 4th Street Suite 3600  
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Charlotte, NC 28217

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Parker Poe Adams & Bernstein LLP  
401 South Tryon Street, Suite 3000  
Charlotte, NC 28202

First Data Global  
4620 Woodland Corporate  
Tampa, FL 33614

North Carolina Department of Revenue  
PO Box 25000  
Raleigh, NC 27640

Bank of America  
POB 982238  
El Paso, TX 79998

Habib Taghehchian  
Unknown

Novant Health  
PO Box 602584  
Charlotte, NC 28260

Bank of America  
P.O. Box 15710  
Wilmington, DE 19886-5710

Helen Babu  
6067 Bluebird Hill Ln  
Matthews, NC 28104

Southeastern Lines Inc.  
3845 Shopton Rd  
Charlotte, NC 28217

Barclays Bank  
PO Box 8803  
Wilmington, DE 19899

IC System Inc.  
PO Box 64378  
Saint Paul, MN 55164

SYNCB/Pay Pal  
PO Box 965005  
Orlando, FL 32896

BB&T  
c/o Ashley Edwards, Esq.  
Fax: 704.334.4706  
401 S. Tryon St Ste. 3000  
Charlotte, NC 28202

Internal Revenue Service  
Centralized Insolvency Operations  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Tanya Monge Taghehchian  
11233 Stonebriar Dr  
Charlotte, NC 28277

U.S. Attorney's Office  
227 West Trade St.  
Ste. 1650  
Charlotte, NC 28202

Verizon Wireless  
PO Box 650051  
Dallas, TX 75265

Wilson County Superior Court  
115 Nash St E  
Wilson, NC 27893